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February 19, 2001

DEPT OF TRANSPORTATION

In reply to:Docket No. FMCSA-97-2289 -43

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To Whom It May Concern:

SUBJECT:LOAD SECUREMENT PROPOSED RULES

I have read the Proposed Rules, Federal Register / Vol 65, No. 243 regarding Docket No. FMCSA-97-2289 and agree that the regulations concerning shifting and falling cargo are in need of revised regulations. The Texas Department of Public Safety in December of 1999 certified me to perform D.O.T. Inspections. I have maintained my certification and have advanced to Haz-Mat certification as well as Cargo Tank certification. I have come across numerous trucks, 393 Level 1 Inspections for the year 2000, and have come to learn that each person you speak to interprets the issue of load securement very different. Although the FMCSR's provide the reader with the information to enforce load securement and the violations that exist through the CVSA out of service criteria, there seems to be no clear rules as to secure certain articles.

I have contacted safety directors, owners, and of course spoken with drivers who all interpret the regulations a little different. In fact, I ("we") the police department has found that other police agencies interpret the regulations different depending on the secured load. So if you have inspectors not agreeing on the exact method to secure items, how can you expect the business's to know exactly how to secure there articles. I feel the proposed rules are a start to getting some sort of conformity so that we all, inspectors and owners, can safely inspect and load a product and have it enforced the same way anywhere they may travel.

I hope the rules are passed as we all need to be on the same page when it comes to enforcement because we all have family members somewhere traveling the roadways of the United States with a truck not to far away.

Sincerely,

Bryon Vecera
D.O.T. Inspector
Houston Police Dept. /Truck Enforcement Unit

HOUSTON POLICE DEPARTMENT/TRUCK ENFORCEMENT
61 RIESNER
HOUSTON, TX 77002